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June 13, 2019

VIA ECF

The Honorable Jesse M. Furman
United States District Judge
Southern District of New York
Thurgood Marshall
United States Courthouse Room 1105
40 Foley Square
New York, New York 10007

Re: *United States v. Remyck Liz*
19 Cr. 438 (JMF)

Dear Judge Furman:

I represent Mr. Remyck Liz, the defendant in the above-referenced matter. With no objection from A.U.S.A. Molly Bracewell and United States Pre-trial Services Officer Natasha Ramesar, I write to respectfully request an order temporarily modifying one of Mr. Liz's bail conditions as set by Magistrate Judge Barbara C. Moses on April 17, 2019. This is the first request to modify Mr. Liz's bail conditions.

Currently, Mr. Liz is at liberty on a \$100,000 personal recognizance bond secured by two financially responsible persons with a condition of home detention and electronic monitoring. Additionally, Mr. Liz, whose travel is restricted to the Southern and Eastern District of New York, previously surrendered his passport and may not apply for new travel documents. He must undergo testing, evaluation and treatment for substance abuse as directed and was required to and has successfully found gainful employment. Officer Ramesar has informed that Mr. Liz has been in compliance with the terms of his release.

Mr. Liz seeks a temporary modification of the home detention requirement of his bail conditions to enable him to attend his two year-old child's birthday party at "Bounce-N-Play" located at 20-21 Steinway Street, Astoria, New York on July 5, 2019, from 7:30 p.m. to 10:30

The Honorable Jesse M. Furman

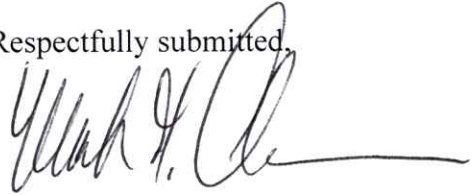
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p.m. As such, it is respectfully requested that Your Honor modify the home detention condition of Mr. Liz's current bond to permit him to travel to and from Astoria, Queens to attend the party and return home by 11:30 p.m.

We thank Your Honor for your time and consideration of this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Mark I. Cohen', with a long horizontal flourish extending to the right.

Mark I. Cohen, Esq.

MIC/jsr

cc: A.U.S.A. Molly Elizabeth Bracewell (Via ECF)
P.T.S.O. Natasha Ramesar (Via Email)
Mr. Remyck Liz (Via Email)